

**STUART H. FINKELSTEIN**

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Magistrate Stewart D. Aaron  
Southern District of New York  
Daniel Patrick Moynihan  
United States District Court  
500 Pearl Street - Courtroom 11C  
New York, New York 10007

Re: Antolini vs. McCloskey, et al  
Case No.: 1:19-cv-09038-GBD

Dear Judge Aaron,

To remind the Court, I represent Plaintiff Dino Antolini in this lawsuit. I write to request a brief extension of time to respond to Judge Daniels' September 19, 2022, Order. See Dkt. No. 307. This is the first request of its kind.

On September 19, 2022, Judge Daniels issued an Order directing Plaintiff's Counsel to produce certain documents relating to finances. See Dkt. No. 307. Your Honor further ordered Plaintiff's Counsel to comply with Judge Daniels' order by November 1, 2022. See Dkt. No. 310. In accord with both Judge Daniels and Judge Aaron's orders, Plaintiff's Counsel submits this request for a three-week extension of time to November 22, 2022.

Plaintiff's counsel has encountered some level of difficulty in acquiring all of the documentation outlined in Judge Daniels' order. Plaintiff's counsel is working diligently to compile the relevant documents. This extension of time will allow Plaintiff to compile an accurate illustration of his dire financial condition, which is the purpose of this endeavor.

Further, Plaintiff's counsel was recently involved in a destructive car accident. Plaintiff's counsel was rescued from the car by emergency services and was treated at the hospital where he had MRIs and CT scan taken. Treatment was provided for multiple bodily injuries. This has limited Plaintiff's counsel and has provided an unforeseen set back. What is more, as the Court is aware, Plaintiff's Counsel's wife is still recovering from breast cancer. This continues to take a toll and recently has been all-consuming due to her very recent second surgery.

This request is made in good faith and will not prejudice any party. Judge Daniels did not set an original deadline for the production. This time will allow Plaintiff's counsel to make sure he can compile the documents going back almost four years.

Wherefore, Plaintiff's counsel respectfully requests a brief three-week extension of time to work to comply with Judge Daniels' order. We appreciate the Court's attention to this matter.

Very truly yours,

Stuart H. Finkelstein

Via Pacer

ENDORSEMENT: Attorney Finkelstein's 11/1/2022 request (ECF No. 311) for an extension of the 11/1/2022 deadline to comply with District Judge Daniels' 9/19/2022 Order (ECF No. 307) is GRANTED IN PART and DENIED IN PART. The deadline for Attorney Finkelstein to complete the required production hereby is extended until 11/22/2022, as he requested, provided, however, that he shall make the initial production set forth below no later than 11/15/2022.

The 9/19/2022 Order directed Attorney Finkelstein to produce: (1) Personal tax returns for years 2019-2021; (2) Bank records for any bank account (this includes, but is not limited to, any personal or business checking or savings accounts, any investment accounts, retirement accounts, as well as any certificates of deposits), for the years 2019-2021; and (3) Records of any transfer of funds or property in the excess of \$1,000.00 in value made within the last three years. Attorney Finkelstein had three weeks prior to his 10/10/2022 auto accident (see 21-CR-00217, ECF No. 87) to begin compiling the required documents. Thus, no later than 11/15/2022, Attorney Finkelstein shall make an initial production of bank records from his principal personal and business checking and savings accounts for calendar year 2021. SO ORDERED.

Dated: 11/3/2022

A handwritten signature in blue ink, appearing to read "Stuart J. Aaron". The signature is written in a cursive, flowing style.